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10 Attorneys for Defendant  
11 Mr. Wilson

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13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA, ) Case No. 2:21-cr-00155-JAM  
16 Plaintiff, )  
17 vs. ) **STIPULATION AND ORDER TO CONTINUE**  
18 JOSHUA WILSON and ) **STATUS CONFERENCE AND EXCLUDE TIME**  
19 CODY CRAMER, )  
20 Defendants. )  
21 Date: November 21, 2023  
22 Time: 9:00 a.m.  
23 Judge: Hon. John A. Mendez  
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IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for November 21, 2023 at 9:00 be continued to

**February 13, 2024, at 9:00 a.m.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on November 21, 2023 at 9:00 a.m.
2. By stipulation, Mr. Wilson now moves to continue the status conference to February 13, 2024 at 9:00 a.m.

- 1       3. To date, the government has produced approximately 850 pages and various
  - 2              audio/video recordings of discovery to the defendants.
  - 3       4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,
  - 4              investigate and research possible defenses, research potential pretrial motions, and
  - 5              explore potential resolutions to the case, and otherwise prepare for trial.
  - 6       5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance
  - 7              would deny them the reasonable time necessary for effective preparation, taking
  - 8              into account the exercise of due diligence.
  - 9       6. Neither the government nor Mr. Cramer object to the continuance.
  - 10      7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
  - 11              Act), the parties request that the time period between November 21, 2023 and
  - 12              February 13, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. §
  - 13              3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
  - 14              granted by the Court at the defense's request, based on a finding that the ends of
  - 15              justice served by granting the continuance outweighs the best interest of the
  - 16              public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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2 Respectfully submitted,  
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4 HEATHER E. WILLIAMS  
Federal Defender  
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6 Date: November 15, 2023  
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8 Date: November 15, 2023  
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10 Date: November 15, 2023  
11 PHILLIP A. TALBERT  
United States Attorney  
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13 Date: November 15, 2023  
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*/s/ Hootan Baigmohammadi*  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Mr. Wilson

*/s/ Kyle Knapp*  
Kyle Knapp  
Attorney for Mr. Cramer

*/s/ James R. Conolly*  
James R. Conolly  
Assistant United States Attorney  
Attorneys for Plaintiff

## ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: November 16, 2023

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE